

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
DANIEL P. ERRIGO, JR. and :
CYNTHIA M. PAISLEY-ERRIGO : CHAPTER 13
Debtors. :

PEOPLES SECURITY BANK & TRUST, :
successor in interest to Peoples :
Neighborhood Bank :
Movant, :
:
VS. :
DANIEL P. ERRIGO, JR. and :
CYNTHIA M. PAISLEY-ERRIGO : CASE NO. 5-19-00116
Respondents. :

**DEBTORS' ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Daniel and Cynthia Errigo, the Debtors, and files an Answer to
Peoples Security Bank & Trust's Motion for Relief From the Automatic Stay:

1. Daniel and Cynthia Errigo (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make monthly payments.
3. Debtors are attempting to sell the property and additional time is needed. Debtors request the parties enter into a Stipulation to include the post-petition arrears in an amended Plan.
4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtors respectfully request that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: March 26, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
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(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 26, 2019, he caused a true and correct copy of Debtor's Answer to People's Security Bank & Trust's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

James Shoemaker, Esq. at jshoemaker@hkqlaw.com

Dated: March 26, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire